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**FILED VIA ECF**

Honorable Paul G. Gardephe  
United States District Court Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Everytown for Gun Safety Action Fund, Inc. v. Defcad, Inc. et al.*, 21-cv-08704 –  
Proposed Protective Order

Dear Judge Gardephe:

We write on behalf of the parties to seek entry of a protective order in this case. Per the Court's Individual Practice Rule IV.F, the parties attach a blackline as **Exhibit A** to this letter showing all deviations from the Court's Model Protective Order.

Modifications to the proposed protective order shown in green text are proposed modifications agreed upon by both parties.

Respectfully submitted,

/s/Marcella Ballard

Encl. proposed protective order, Ex. A  
cc: Counsel of Record